



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

180358
0000006

JUL 15 2003

REPLY TO THE ATTENTION OF

MEMORANDUM

SUBJECT: **ACTION MEMORANDUM** - Request for a Ceiling Increase to Complete the Time-Critical Removal Action at the IWI Site, Summit, Cook County, Illinois (Site ID # B53J)

FROM: Fredrick A. Micke, On-Scene Coordinator
Emergency Response Branch - Section 3

TO: William E. Muno, Director
Superfund Division

THRU: Richard C. Karl, Chief
Emergency Response Branch

I. PURPOSE

The purpose of this memorandum is to request and document your approval to increase the project ceiling in order to complete the ongoing time-critical removal action. The ceiling increase is necessary to continue mitigation of threats to public health, welfare and the environment posed by the presence of uncontrolled hazardous wastes abandoned at the IWI Site. The proposed project ceiling increase of \$795,500, combined with the previously approved project ceiling of \$660,000 would bring the total allowable project funding expenditure to \$1,455,500.

The presence of hazardous substances existing at the site have been documented and include flammable, toxic heavy metals (antimony, chromium, and lead) and TCLP metals (chromium up to 42.4 mg/L and lead from 7.18 mg/L to 281 mg/L) and various oxidizer and corrosive liquid and solid wastes. Proper packaging and off-site disposal of these hazardous materials will alleviate further impacts to the environment and surrounding properties.

Since beginning the time-critical removal action, hazardous waste has been identified in 578 drums, 91 totes, 1 tanker car, and 10 sumps discovered throughout the site. To date, ten separate waste streams have been identified. The waste streams identified to date are: asbestos, building debris, scrap metal, brick, non-hazardous aqueous liquids with trace oil, hazardous (lead) aqueous liquids (D008), non-hazardous grease,

hazardous (low flash point) grease (D008), non-hazardous ink and paint, and hazardous (low flash point, high BTU) sludge (D028).

The response action proposed herein will mitigate site conditions by properly identifying, characterizing, consolidating, packaging, and ultimately disposing of all wastes considered hazardous. Additional site activities will include dismantling and decontamination of any building or process structures deemed contaminated and unsafe. Because hazardous wastes exist in substantial quantities and in an uncontrolled manner, conditions warrant additional funds in order to complete the time-critical removal action. The project will require an estimated 40 additional working days to complete.

The site is not on the National Priorities List, does not set any precedents and is not considered nationally significant.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # ILD 097 179 204

A. Physical Location

The IWI, Inc., Site is located at 7738 West 61st Place in Summit, Cook County, Illinois. The geographic coordinates of the site are 41°46'47" north latitude and 87°48'51" west longitude. The Site is approximately 1.7 acres and consists of three main buildings within the sites boundaries. The largest building is approximately 45,000 square feet and has several floors, the stack building is approximately 5,000 square feet, the building known as building three is approximately 1,000 square feet. The site is located in a mixed area of both industrial and residential. A residential development is located directly south of the site.

B. Site Description and Background

According to the Village of Summit Building Code Enforcement Officer, Mr. Jeffrey Duley, IWI, Inc., was owned and operated by Mr. Glenn Wellman. Operations at the site included chemical tote manufacturing and chemical tote, drum, and pail reconditioning and processing. The original source(s) of the on-site containers is unknown. Site operations at the Site ceased in 1999, and Mr. Wellman has since passed away.

According to records, two fires have occurred at this facility, the first fire in August 1985 that Illinois Environmental Protections Agency (IEPA) responded to and again in May 2002 that US EPA responded to.

On May 16, 2002, Bruce Everetts, Supervisor, Illinois EPA, Bureau of Land, Division of Remediation Management referred the Site to the United States Environmental

Protection Agency (U.S. EPA). In his referral, he wrote, "This is an abandoned, uncontrolled site that poses a threat to the environment and trespassers. A fire on Monday, May 13, 2002, which leaves drums exposed to the weather, underlines the urgency for quick action."

During a Site assessment conducted on June 24 and 25, 2002, access to the site was unrestricted. The chain-link fence bordering the site to the north had a hole cut in it that was approximately 4 feet wide. The temporary fencing located on the southern border of the site was secured with wire ties and can be easily opened. There was evidence of trespassing including graffiti throughout the site. Furthermore, many of the site buildings were significantly damaged by the fire and were inaccessible because of severe roof and floor damage.

For a more detailed description of site conditions and background information, refer to the original Action Memorandum, dated November 29, 2002

C. Removal Actions to Date

On January 21, 2003, U.S. EPA mobilized its Emergency Response and Removal Service (ERRS) to the IWI Site to initiate time-critical removal activities. ERRS initiated grubbing at the Site and the procurement of Site trailers and utility services. Site activities were suspended on February 5, 2003 because of the Emergency Response Branch's response to the recovery of Columbia Shuttle material in Texas and Louisiana.

On March 10, 2003, U.S. EPA remobilized its ERRS contractor to the IWI Site. Superfund Technical Assistance and Response Team (START) support was initiated at the Site on March 12, 2003. Specifically, the following activities have been completed to date:

- 1) Implemented the site health and safety and work plans. Established a command post and work zones;
- 2) One large building was demolished in order to safely access totes stored in the building.
- 3) Identified, inventoried, staged and characterized all containerized wastes discovered on-site (91 totes, 578 drums, 10 sumps, asbestos [wrap and "transite paneling"] and 1 tank car.);
- 4) Laboratory analysis has been initiated and has been completed for some waste groups. Disposal approval has been initiated;

- 5) Building demolition debris from the building demolished to access totes and the two buildings destroyed in the fire of May 2002 have been transported and disposed of;
- 6) Scrap metal and building brick from the building debris noted above have been sold to offset project costs;

D. Justification for the Project Ceiling Increase

- 1) Upon mobilizing for the time-critical removal and having performed a detailed reconnaissance and evaluation of the Site, asbestos contamination was discovered. In addition the poor condition of one building necessitated the demolition of the building in order to safely remove totes from the building.
- 2) The "drum storage room" footprint was completely covered with drums and no access to the room was possible. This created a very low estimate of drums in the room when the site assessment was prepared (170 drums). The total number of drums staged and overpacked at the Site was 578. Drum transportation and disposal costs will, therefore, be higher than previously estimated.
- 3) A vast majority of the drums were found to be full of material and having no top. In addition, most of the drums were stacked four to six high. These issues made the overpacking of drums a very slow process. Personnel and equipment costs, therefore, increased.
- 4) The poor condition of the smoke stack located in the sludge room necessitates the removal of the smoke stack before the sludge can safely be removed. This added demolition cost was unforeseen.]
- 5) The sludge in the sludge room is flammable and is of a "jello consistency". Transportation and disposal of the sludge will be higher than previously estimated.

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions present at the IWI Site continue to present an imminent and substantial threat to the public health, or welfare, and the environment based upon the factors set forth in Section 300.415(b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (N.P.), as amended, 40 CFR Part 300. These factors include, but are not limited to, the following:

- 1) *Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;*
- 2) *Threat of fire or explosion;*
- 3) *The unavailability of other appropriate Federal or State response mechanisms to respond to the release;*

Please refer to the original Action Memorandum dated November 29, 2002, for detailed threat information. Public health and environmental threats and contaminants of concern remain the same only the volumes of wastes have changed.

IV. ENDANGERMENT DETERMINATION

Given the site conditions, the nature of the suspected hazardous substances on site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions selected in this and the original Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The OSC proposes to undertake the following actions to mitigate threats posed by the presence of hazardous wastes at the IWI Site:

- 1) Inventory and perform hazard characterization of all wastes contained in containers, drums, sumps, and tanks;
- 2) Consolidate and package all waste for transportation and off-site disposal;
- 3) Dismantle and decontaminate the remaining buildings, tanks, boilers, floor trenches, and sumps associated with the IWI Site.
- 4) Sample and analyze on-site and off-site soils.
- 5) Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants at a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 CFR § 300.440);
- 6) Sell scrap metal and building brick in order to reduce project costs;
- 7) Construct a permanent perimeter fence in order to secure the Site.

The OSC has initiated planning for provision of post-removal site control consistent with the provisions of Section 300.415(l) of the NCP.

The threats posed by open tanks of wastes considered hazardous meet the criteria listed in Section 300.415(b)(2) of the NCP and are consistent with any long-term remedial actions which may be required.

The detailed cleanup contractor cost estimate is presented in Attachment 1 and estimated project costs are summarized below:

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

Regional Removal Allowance Costs: \$ 527,900

Total Cleanup Contractor Costs
(This cost category includes estimates for: ERRS, subcontractors, and Notices to Proceed. Includes a 15% contingency).

Other Extramural Costs Not Funded from the Regional Allowance:

Total START, including multiplier costs \$ 135,000

Subtotal, Extramural Costs \$ 662,900

Extramural Costs Contingency + \$ 132,600
(20% of Subtotal, Extramural Costs)

TOTAL, REMOVAL ACTION PROJECT CEILING \$ 795,500

The response actions described in this memorandum directly address the actual or threatened release at the site of a hazardous substance, or of a pollutant, or of a contaminant which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Applicable or Relevant and Appropriate Requirements

All applicable and relevant and appropriate requirements (ARARs) of federal and state law will be complied with to the extent practicable.

All hazardous substances, pollutants or contaminants removed off site pursuant to this removal action for treatment, storage and disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-site Rule, 40 CFR § 300.440.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Continued risk to public health and the environment will result if no action or delayed action ensues at the HM Site.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum attached.

The EPA ceiling increase costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$1,168,228¹

$$(795,500 + 25,000) + (42.38\% \times 820,500) = \$1,168,228$$

The total U.S. EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are now estimated to be \$2,116,948.

¹ Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgement interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States's right to cost recovery.

IX. RECOMMENDATION

This decision document represents the selected removal action for the IWI Site located in Summit, Cook County, Illinois. This document has been developed in accordance with CERCLA as amended and is consistent with the N.P. This decision is based on the Administrative Record for the site (see Attachment 2). Conditions at the site meet the N.P. S300.415 (b)(2) criteria for a time-critical removal action and I recommend your approval of the proposed ceiling increase of \$1,168,228, of this, an estimated \$660,500 may be used for the cleanup contractor costs. The total removal project ceiling, if approved, will be \$1,455,500. You may indicate your decision by signing below.

APPROVE: W. E. Ryan DATE: 7/15/03
Director, Superfund Division

DISAPPROVE: _____ DATE: _____
Director, Superfund Division

Enforcement Addendum

Attachments

1. Detailed Cleanup Contractor Cost Estimate/Independent Government Cost Estimate
2. Administrative Record Index
3. Original Action Memorandum dated November 29, 2002

cc: R. Worley, U.S. EPA, 5203-G
M. Chezik, U.S. DOI, w/o Enf. Addendum
R. Cipriano, Illinois EPA w/o Enf. Addendum
S. Davis, Illinois Dept. of Natural Resources w/o Enf. Addendum

ENFORCEMENT ADDENDUM

**IWI, INC. SITE
SUMMIT, COOKE COUNTY, ILLINOIS**

OCTOBER 2003

**ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY**

(REDACTED 1 PAGE)

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT 1

DETAILED CLEANUP CONTRACTOR COST ESTIMATE INDEPENDENT GOVERNMENT CLEANUP CONTRACTOR ESTIMATE

**IWI Site
Summit, Cook County, Illinois
July 2003**

The estimated cleanup contractor (ERRS) costs necessary to complete the removal action at the IWI Site are as follows:

Personnel & Equipment	\$ 147,200
Materials	\$ 9,200
Transportation and Disposal	<u>\$ 563,500</u>
Sub-Total	\$ 719,900
<u>Less—return on brick and scrap metal</u>	\$ - 75,000
<u>Less ERRS funds remaining</u>	<u>\$ -117,000</u>
Grand Total	\$ 527,900



ATTACHMENT 2

U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

ADMINISTRATIVE RECORD FOR IWI INC. (ITASCO) SITE SUMMIT, COOK COUNTY, ILLINOIS

**UPDATE #1
JULY 2, 2003**

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	03/27/03	Micke, F., U.S. EPA	Distribution List	POLREP #1 (Initial) for the IWI, Inc. Site	2
2	04/14/03	Micke, F., U.S. EPA	Distribution List	POLREP #2 for the IWI, Inc. Site	3
3	04/30/03	Micke, F., U.S. EPA	Distribution List	POLREP #3 for the IWI, Inc. Site	3
4	05/23/03	Micke, F., U.S. EPA	Distribution List	POLREP #4 for the IWI, Inc. Site	3
5	06/17/03	Micke, F., U.S. EPA	Distribution List	POLREP #5 for the IWI, Inc. Site	3
6	00/00/00	Micke, F., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Request for a Ceiling Increase to Complete the Time-Critical Removal Action at the IWI, Inc. Site (PENDING)	

ATTACHMENT 3

ORIGINAL ACTION MEMORANDUM DATED NOVEMBER 29, 2002



170520
0000000

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

MEMORANDUM

SUBJECT: **ACTION MEMORANDUM** - Request to Conduct a Time-Critical Removal Action at the Itasco, also known as the IWI Inc. Site, Summit, Cook County, Illinois.

FROM: *Kenneth B. Rhame*
Kenneth B. Rhame, On-Scene Coordinator
Emergency Response Branch - Section 3

TO: William E. Muno, Director
Superfund Division

THRU: Richard Karl, Chief *R. Karl*
Emergency Response Branch

I. **PURPOSE**

The purpose of this memorandum is to request and document your approval to expend up to \$660,000 in order to mitigate threats to public health, welfare, and the environment at the IWI Inc. Site located in Summit, Cook County, Illinois. The response action is necessary to address the release and the threat of future releases of various abandoned hazardous materials, including solutions that are highly flammable. Analyses for hazardous waste characteristics were performed on the material collected from 12 containers. The results indicate that the material contained in 11 of the 12 containers, exhibits the characteristic of a hazardous waste due to ignitability. The material in the 11 of the 12 containers had a flashpoint below the regulatory level of 140 degrees Fahrenheit (°F). Also 4 of the 12 containers failed the paint filter test, which indicates that they contained free liquid. In addition, many of the containers sampled had elevated concentrations of metals (antimony, chromium, and lead) and TCLP metals (chromium up to 42.4 mg/L and lead from 7.18 mg/L to 281 mg/L). These containers as well as buildings in which these containers are stored have been left on site by a deceased owner/operator. Proper packaging and off-site disposal of these hazardous materials will alleviate further impacts to the environment and surrounding

The response actions to the release and potential release of hazardous materials will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC§ 9604(a)(1) to abate the further release into the environment. Presence of flammable liquids, sludges, and unknowns in above ground storage tanks (ASTs), drums, chemical totes, and open containers, some of which have leaked, makes this a time-critical removal action.

There are no nationally significant or precedent setting issues associated with the IWI, Inc., site. This site is not on the National Priorities List.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# ILD 097 179 204

The IWI, Inc., site is located at 7738 West 61st Place in Summit, Cook County, Illinois. The geographic coordinates of the site are 41°46'47" north latitude and 87°48'51" west longitude. The site is approximately 1.7 acres and consists of three main buildings within the sites boundaries. The largest building is approximately 45,000 square feet and has several floors, the stack building is approximately 5,000 square feet, the building known as building three is approximately 1,000 square feet. The site is located in a mixed area of both industrial and residential. A residential development is located directly south of the site.

According to the Village of Summit Building Code Enforcement Officer, Mr. Jeffrey Duley, IWI, Inc., was owned and operated by Mr. Glenn Wellman. Operations at the site included chemical tote manufacturing and chemical tote, drum, and pail reconditioning and processing. The original source(s) of the on-site containers is unknown. According to Mr. Duley, operations at the site ceased in 1996, and Mr. Wellman has since passed away.

According to records, two fires have occurred at this facility, the first fire in August 1985 that Illinois Environmental Protections Agency (IEPA) responded to and again in May 2002 that US EPA responded to.

On May 16, 2002, Bruce Everetts, Supervisor, Illinois EPA, Bureau of Land, Division of Remediation Management referred the Site to the United States Environmental Protection Agency (U.S. EPA). In his referral, he wrote, "This is an abandoned, uncontrolled site that poses a threat to the environment and trespassers. A fire on Monday, May 13, 2002, which leaves drums exposed to the weather, underlines the urgency for quick action."

During a Site assessment conducted on June 24 and 25, 2002, access to the site was unrestricted. The chain-link fence bordering the site to the north had a hole cut in it that was approximately 4 feet wide. The temporary fencing located on the southern border

of the site was secured with wire ties and can be easily opened. There was evidence of trespassing including graffiti throughout the site. Furthermore, many of the site buildings were significantly damaged by the fire and were inaccessible because of severe roof and floor damage.

During the initial site reconnaissance a MultiRAE photoionization detector (PID) and a GM Pancake were used to determine if either organic or radiological contamination was present inside the site buildings. Both PID and radiological readings were zero. Floor damage on the second floor was severe enough to prevent full exploration of the second floor. Approximately 41 containers were noted on the second floor, including two fiberglass AST's (15,000 gallons each), one 500-gallon AST, one 275-AST, and 27 55-gallon drums.

Approximately 170 fifty-five gallon drums were identified during the site assessment. Many of these drums were inaccessible because they were stacked or because they were unstable due to their deteriorated condition. Many of the drums were leaking or were improperly sealed. Drums located in the drum storage area south of room five were leaking and were draining into the drainage ditch to the west. Furthermore, chemical totes and ASTs of varying capacity were also encountered on-site. The totes varied from 345 gallons to 600 gallons. The ASTs ranged in size from 275 gallons to 20,000 gallons.

In Region 5 Environmental Justice (EJ) Criteria for Illinois: the low-income percentage is 54% or greater and the minority is 50% or greater. To meet the environmental justice (EJ) criteria, the area within 1 mile of the Site must have a population that's twice the state low-income percentage and/or twice the state minority percentage. At this site, the low-income percentage is 58% and the minority percentage is 81%. Therefore, this Site does meet the region's EJ criteria based on demographics as identified in the "Region 5 Superfund EJ Analysis Itasca Site Summit, IL.

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the IWI Summit Site present and imminent and substantial endangerment to the public health, welfare, and the environment and meet the criteria for a time-critical removal action provided for in Section 300.415 (b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as amended, 40 CFR Part 300. These factors include, but are not limited to the following:

- i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

Analytical results indicate that surfaces soil has been impacted by elevated concentrations of lead and chromium. Total lead concentrations on-site were detected up to a maximum concentration of 4,240 mg/kg. In one sample, chromium was

detected at a concentration of 820 mg/kg. In addition, TCLP lead (12.7 mg/L) in site soils exceeded the criteria for toxicity. The contents of multiple containers on site were found to have flashpoints below the minimum temperature level (140°F) which would indicate that the material exhibits the characteristics of a hazardous waste for ignitability as outlined in 40 CFR, Chapter 1, Section 261. Because access to the site is unrestricted and because human activity is apparent at the site, the presence of high lead and chromium levels in site soils as well as the presence of petroleum waste and waste hazardous wastes in the containers that have been abandoned on-site, increases the likelihood that the site poses a significant threat to human health and the environment.

- ii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release.

Some of flammable and unknown liquids are leaking from vats and tanks. The hazardous materials containers, including ASTs, totes, and drums, are scattered around the facility both inside and outside the buildings. Now that no one is taking care of the facility and the materials stored on the property, conditions are subject to deteriorate. Trespassing, scavenging, and vandalism are also worrisome factors under these circumstances.

- iii) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

Due to the materials and containers location and with the onset of cold temperatures, many of the containers of hazardous liquids are subject to freeze and rupture, thus causing widespread contamination. Also, some of these materials are exposed to the elements and are subject to be washed off site causing discharges into surface water and soils.

- iv) Threat of fire or explosion.

Drums, chemical totes, and ASTs were observed on the IWI site. The locations and conditions of these containers varied substantially. A majority of the drums were severely damaged and degraded as they were leaking, rusting, and bulging. Most of the chemical totes appeared to be in suitable shape, but some have deteriorated. The contents of these containers are mostly unknown though many containers appeared to be empty. The possibility of fire or explosion exists if the material inside a container is highly flammable. The contents of 11 of the 12 containers sampled were found to have flashpoints below 140 °F, which exceeds the regulatory limits used to define a hazardous waste for ignitability. The flammability of the material inside the containers coupled with the possibility of a spark being generated from collapsing drums or structures presents a threat of fire or explosion. Two fires have already occurred at the site in August 1985 and in May 2002.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The response actions described in this memorandum directly address actual or potential releases of hazardous substances on Site, which pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on Site will include:

- 1) Develop and implement a **Site Health and Safety and Site Security Plan**;
- 2) Sample and characterize **all the waste** containers and contaminated soils;
- 3) Secure, package, and dispose of the containerized waste;
- 4) Take any response actions **necessary** to address any release or threatened release of a hazardous substance, pollutants, or contaminant that the U.S. EPA determines may pose an **imminent** and substantial endangerment to public health or the environment **including** potential impact on surface water or ground water.
- 5) Conduct post removal sampling and analysis to verify completion of the removal action;

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(1) of the NCP. Elimination of all surface threats is, however, expected to minimize the **need** for post-removal Site control.

It may be necessary to demolish and/or stabilize some of the buildings on site in order to conduct the removal action safely.

The removal activities are expected to take 45 on-site working days to complete.

The detailed cleanup contractor cost is presented in Attachment 1 and estimated project costs are summarized below:

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

Regional Removal Allowance Costs:

Total Cleanup Contractor Costs

\$500,000

(This cost category includes estimates for: ERRS, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Includes 15% Contingency.)

<u>Other Extramural Costs Not Funded from the Regional Allowance:</u>	
Total START, including multiplier costs	\$50,000
Subtotal	\$50,000
Subtotal, Extramural Costs	\$550,000
Extramural Costs Contingency (20% of Subtotal, Extramural Costs)	<u>+\$110,000</u>
TOTAL, REMOVAL ACTION PROJECT CEILING	\$660,000

All hazardous substances, pollutants, or contaminants removed off Site pursuant to this removal action for treatment, storage, or disposal shall be treated, stored, or disposed of at a facility in compliance as determined by U.S. EPA Off-Site Rule, 40 CFR § 300.440.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the Site which may pose an imminent and substantial endangerment to public health and safety and the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Applicable or Relevant and Appropriate Requirements

All applicable, relevant, and appropriate requirements (ARARs) of Federal and State law will be complied with to the extent practicable.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed or no action will increase the potential of the corrosive and toxic hazardous substances to release, thereby threatening the adjacent population and the environment.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in the Enforcement Confidential Addendum.

According to the Village of Summit Building Code Enforcement Officer, Mr. Jeffrey Duley, the IWI, Inc. Site has been abandoned since 1996, and Mr. Glenn Wellman (Owner/Operator) has since passed away.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$948,720.¹

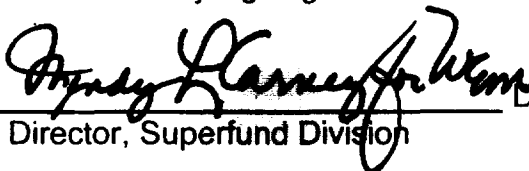
$$\$660,000 + \$10,000 + (41.6\% \times \$670,000) = \$948,720$$

IX RECOMMENDATION

This decision document represents the selected removal action for the IWI, Inc., Site located at 7738 West 61st Place in Summit, Cook County, Illinois. It was developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for the Site. Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend our approval of the proposed removal action. The total project ceiling, if approved, will be \$660,000. Of this, an estimated \$500,000 comes from the regional removal allowance.

¹ Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgement interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

You may indicate your decision by signing below.

APPROVE:  DATE: 11/29/02
Director, Superfund Division

DISAPPROVE: _____ DATE: _____
Director, Superfund Division

Enforcement Addendum

Attachments

1. Detailed Cleanup Contractor Cost Estimate
2. Administrative Record Index

cc: R. Worley, U.S. EPA 5202G
M. Chezik, U.S. Department of Interior, w/o Enf. Addendum
R. Cipriano, Illinois EPA w/o Enf. Addendum
S.Davis, Illinois Dept. of Natural Resources w/o Enf. Addendum

**PAGE 9 HAS BEEN REDACTED AS IT CONTAINS A
BCC LIST NOT RELEVANT TO THE REMOVAL
ACTION.**

**THE ENFORCEMENT ADDENDUM FOR THE IWI, INC.
SITE HAS BEEN REDACTED AS IT IS NOT RELEVANT
TO THE REMOVAL ACTION.**

ATTACHMENT 1**DETAILED CLEANUP CONTRACTOR ESTIMATE****IWI, INC., SITE
SUMMIT, COOK COUNTY, ILLINOIS
OCTOBER 2002**

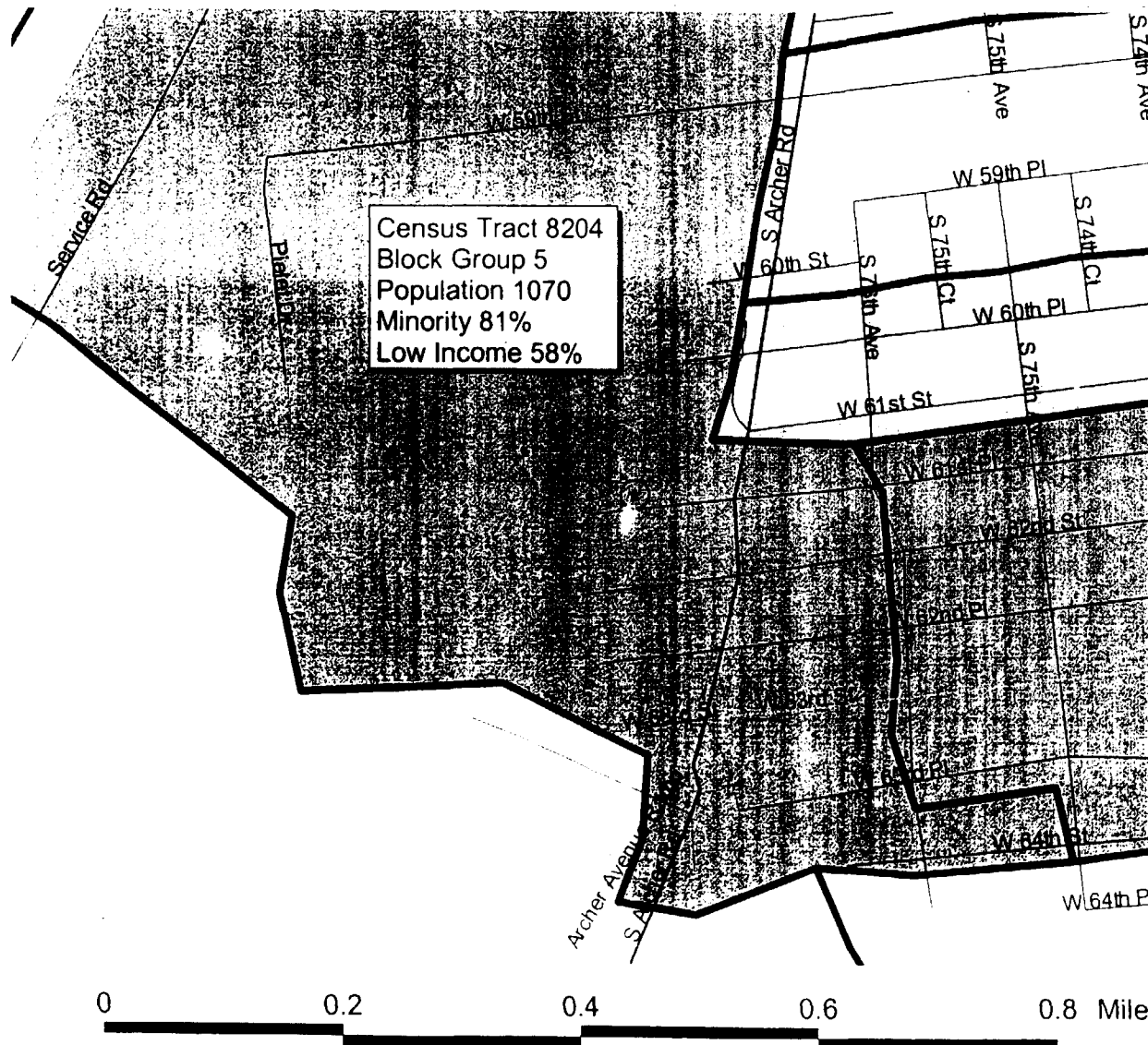
The estimated cleanup contractor **costs** necessary to complete the removal action at the IWI, Inc., Site are as follows:

Personnel	\$90,000
Equipment	\$84,000
Transportation and Disposal	\$280,000
Other Subcontractors	\$46,000
	=====
	\$500,000

**THE INDEPENDENT GOVERNMENT COST ESTIMATE
FOR THE IWI, INC. SITE HAS BEEN REDACTED AS IT
IS NOT RELEVANT TO THE REMOVAL ACTION.**

Region 5 Superfund EJ Analysis

Itasca Site Summit, IL



EJ Identification

Low Income and Minority Less than State Average

Low Income or Minority at or Greater than State Average

Low Income or Minority 2 Times or Greater than State Average
[meets Region 5 EJ Case criteria]

★ Site Location

Block Group Boundary

Region 5 EJ Case Criteria for Illinois

Minority: 50% or greater

Low Income: 54% or greater

ATTACHMENT 2

U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

ADMINISTRATIVE RECORD FOR ITASCO (IWI INC.) SITE SUMMIT, COOK COUNTY, ILLINOIS

ORIGINAL
OCTOBER 29, 2002

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	05/16/02	Everetts, B., Illinois EPA	Nachowicz, L., U.S. EPA	Letter re: Illinois EPA's Request for U.S. EPA Assistance in Conducting a Removal Assessment at the IWI Inc. Site	1
2	10/08/02	Weston Solutions, Inc.	U.S. EPA	Site Assessment Report for the IWI Site (Revision 1)	85
3	10/17/02	U.S. EPA	File	Region 5 Superfund EJ Analysis for the Itasco Site	1
4	10/28/02	Rhame, K., U.S. EPA	Everetts, B., Illinois EPA	Letter re: U.S. EPA's Request for Illinois ARARs for the Upcoming Removal Action at the Itasco/IWI Inc. Site	2
5	00/00/00	Rhame, K., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Request to Conduct a Time-Critical Removal Action at the Itasco (IWI Inc.) Site (PENDING)	